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August 20, 1999

CALFED Bay-Delta Program
1416 Ninth Street, Ste. 1155
Sacramento, CA 95814

Re: Comments on Draft EIS/EIR for CALFED Bay-Delta Program

Ladies and Gentlemen:

Enclosed is a copy of the text of the testimony which I attempted to provide on behalf of the Crestline-Lake Arrowhead Water Agency at the August 19, 1999 hearing on the draft EIS/EIR for the CALFED Bay-Delta Program, conducted in San Bernardino. Due to the time limitations, I was only able to read a portion of this testimony into the record. Therefore, please accept the entire text as written comment on the draft EIS/EIR, submitted on behalf of the Crestline-Lake Arrowhead Water Agency.

Thanks very much. The Agency looks forward to seeing the responses to these comments, as well as all other comments on the draft EIS/EIR.

Sincerely yours,



Michael T. Riddell
of BEST BEST & KRIEGER LLP

MTR:cah

Enclosure

cc (w/encl.): Roxanne M. Holmes,
Crestline-Lake Arrowhead Water Agency

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CRESTLINE-LAKE ARROWHEAD WATER AGENCY

**TESTIMONY TO CALFED ON DRAFT PROGRAMATIC EIS/EIR
 FOR BAY-DELTA PROGRAM**

August 19, 1999
 San Bernardino, California

The Crestline-Lake Arrowhead Water Agency was created by special act of the State Legislature in 1962. The Agency supplies imported water from the State Water Project to a large portion of the San Bernardino Mountains. Some of the Agency's customers are retail customers, receiving water service to their homes directly from the Agency. Other customers are retail water purveyors themselves who take water on a wholesale basis from the Agency and then deliver it on a retail basis to their own customers. For many of these customers, the source of supply from the Agency is their only source of supply. If they are not able to receive water from the Agency, they are simply without water.

According to the terms of the Agency's contract with the State, the Agency is entitled to take 5,800 acre feet of water per year from the State Water Project. However, the Agency rarely takes more than 2,000 acre feet of water per year from the Project. So, as you can see, the Agency's current demand for water is quite small. However, when the people within the Agency need that water, it has to be there or else many of them are without any water service whatsoever.

During the drought that occurred eight years ago, when water supply conditions forced the Department of Water Resources to cut back severely on water supplied from the State

Water Project, the Agency's initial allocation of water from the Project was so small that it would have created a serious emergency for the folks living in the San Bernardino Mountains. Of the 5,800 acre feet of water which they have been paying for the right to receive each year, consistently and at considerable expense, their initial allocation for one year was going to be less than 600 acre feet. If DWR had not responded to the Agency's plea for additional water to cope with this emergency, then some of the people within the Agency's service area literally would have had no water running when they turned on the faucets in their homes.

So the Agency's Number 1 priority in the draft EIS/EIR for the Bay-Delta program is to make sure that the program will increase the quantity, and in particular improve the reliability, of the water supply which the people within the Agency have been paying a lot of money for a lot of years to receive. The Agency wants to see hard, tangible, numerical targets for increased water supply and improved reliability during the first several years of the program. It has been suggested that the document set forth water supply goals of at least a net increase of 200,000 to 400,000 acre feet per year during the first 7 years of the program. The Agency not only supports that modest proposal, but really feels that such a goal is not too much to ask given the considerable expense incurred in the past and what can be anticipated in the future. If the best way to achieve that goal is to proceed immediately with the planning and implementation of the South Delta improvements, then the Agency believes that the document should provide for the implementation of those improvements right away.

The Agency's other big issue has to do with water quality. Year after year, the quality of the water supplied by the Agency meets or exceeds all State or Federal drinking water standards, with one exception: trihalomethanes. And year after year, the Agency must supply its customers

with a water quality report advising them that THMs continue to be a problem. The Agency explains that the problem exists because the imported water supply is high in organic compounds and bromides, which interact with chlorine in the treatment process to produce THMs. Customers are advised that the best solution to this problem is to reduce the content of the organic compounds and bromides in the water supply, and that Calfed is working on that. The Agency wants to see something more than "long term" goals in the EIS/EIR to address that problem.

The Agency believes that the best way to improve the water quality problem would have been to proceed with the construction of an isolated facility. Apparently the decision has already been made to proceed with the "through Delta" approach first to see if it works, but the draft EIS/EIR fails to establish any criteria to determine whether that approach is actually working. The document should set forth a comprehensive timetable for improvements in drinking water quality, and should set forth interim benchmarks to provide a method for gauging the success of the program in achieving those goals. The document should also clearly set forth the conditions that will trigger a full assessment of an isolated conveyance facility if the "through Delta" approach is not successful in achieving specific water quality criteria.

Improved water supply and reliability, and improved water quality, are the two big issues of importance to the Crestline-Lake Arrowhead Water Agency. The Agency believes that the EIS/EIR needs to be much more specific in achieving immediate improvements in both of those areas.

MICHAEL T. RIDDELL of
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